

Message

From: Muneer, Alie [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=DE7C5B1BEBF144E486D721FDFCF17DFA-AMUNEER]
Sent: 10/1/2018 12:51:48 PM
To: Kevin Gauthier [KGauthier@hauthaway.com]
CC: Christopher Reuther [creuther@hauthaway.com]
Subject: RE: P-18-0169 PPE question
Attachments: CFR-2002-title40-vol27-part720.pdf; CFR-2002-title40-vol27-part721.pdf; CFR-2002-title40-vol27-part723.pdf; CFR-2002-title40-vol27-part725.pdf; CFR-2002-title40-vol28-chapl-subchapR.pdf

Hello Kevin: Attached are regulations pertaining to PMNs as Hauthaway continue to evaluate. The purpose of sending the attachments is as an FYI, to use these attachments as reference materials and to gain a better understanding of the regulations that the PMNs are regulated under. Alie Muneer



Alie Muneer

USEPA Headquarters | OCSPP OPPT Chemical Control Division | WJC Building-East | 1200 Pennsylvania Avenue, N. W. |
Mail Code: 7405M | Washington, DC 20460 | Ph# 202 564 6369 | Fax: 202 564 9490 | Email: muneer.alie@epa.gov | Office hours:
M-F, 8am to 4:30pm

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From: Kevin Gauthier [mailto:KGauthier@hauthaway.com]
Sent: Thursday, September 27, 2018 4:10 PM
To: Muneer, Alie <muneer.alie@epa.gov>
Cc: Christopher Reuther <creuther@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Hello Alie,

Just following up with an e-mail. I left you a phone message earlier today to tell you what is going on (and to issue new 15 day suspension for day 90). When I am back in on Tuesday, I will follow-up with details in an e-mail and a phone call.

Regards,

Kevin

From: Muneer, Alie [mailto:muneer.alie@epa.gov]
Sent: Wednesday, September 26, 2018 3:12 PM
To: Kevin Gauthier <KGauthier@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Kevin: What is the status? Will Hauthaway send a list of questions to EPA? Should there still be a conf call?
Alie



Alie Muneer

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From: Muneer, Alie
Sent: Friday, September 21, 2018 3:44 PM
To: Kevin Gauthier <KGauthier@hauthaway.com>
Cc: Christopher Reuther <creuther@hauthaway.com>; John Zermani <JZermani@hauthaway.com>; Ted Johnson <TJohnson@hauthaway.com>
Subject: Re: P-18-0169 PPE question

Kevin:

For use of respiratory protection (NIOSH certified respirator with APF 1000 for spray applications and APF 50 for no spray applications), the following are the regulations:

"(i) *Protection in the workplace.* Requirements as specified § 721.63(a)(1), (a)(2)(i), (iii), (iv), (a)(3), (a)(4), (a)(5)(respirators must provide a National Institute for Occupational Safety and Health with assigned protection factor of at least 50), when determining which persons are reasonably likely to be exposed as required for §721.63(a)(1) and (4), engineering control measures (e.g., enclosure or confinement of the operation, general and local ventilation) or administrative control measures (e.g., workplace policies and procedures) shall be considered and implemented to prevent exposure where feasible), (a)(6)(v), (vi), (particulate), (combination of gas/vapor and particulate) and (c)."

No consumer use ("use in a consumer product "found in § 721.80 (o)) is no use of a chemical substance that is directly, or as part of a mixture, sold or made available to consumers for their use in or around a permanent or temporary household or residence, in or around a school, or in recreation.

Pls let me know if you have any questions.

Regards, Alie Muneer

From: Kevin Gauthier <KGauthier@hauthaway.com>
Sent: Wednesday, September 19, 2018 1:43 PM
To: Muneer, Alie <muneer.alie@epa.gov>
Cc: Christopher Reuther <creuther@hauthaway.com>; John Zermani <JZermani@hauthaway.com>; Ted Johnson <TJohnson@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Hello Alie,

Please see our comments in red below.

Regards,

Kevin

From: Muneer, Alie [<mailto:muneer.alie@epa.gov>]
Sent: Wednesday, September 19, 2018 8:37 AM
To: Kevin Gauthier <KGauthier@hauthaway.com>
Cc: Christopher Reuther <creuther@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Is there a status update to this?

From: Muneer, Alie
Sent: Monday, September 17, 2018 4:16 PM
To: 'Kevin Gauthier' <KGauthier@hauthaway.com>
Cc: Christopher Reuther <creuther@hauthaway.com>
Subject: RE: P-18-0169 PPE question

Kevin: The stipulations are:

- Use of dermal protection (including impervious gloves) Agree
- Use of respiratory protection (NIOSH certified respirator with APF 1000 for spray applications and APF 50 for no spray applications) As the manufacturer of this product we do not engage in the application process of this material. We currently use APRs with an APF of 10 in concert with active ventilation for the manufacturing of our products where industrial hygiene monitoring requires. It is imperative in order to maintain compliance with OSHA standards to evaluate hazards and approach the mitigation of each first with engineering controls and administrative controls before relying on personal protective equipment.
- No consumer use We would like you to clarify “consumer use”, we are manufacturing this for industrial sales and use.
- Manufacturing (including import) the PMN substance with triethylamine concentration no greater than 4% by weight Agree
- APF 1000 for spray applications (please see bullet 2)
- APF 50 for no-spray applications (please see bullet 2)



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